

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

— V. —

Defendant.

20 Cr.

20 CRIM 228

USDC SDNY
DOCUMENT
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DATE FILED: MAR 24 2020

(Threatening Interstate Communications)

1. From at least in or about May 2019, up to and including February 2020, in the Southern District of New York and elsewhere, ALLAMBERGEN KUDAYBERGENOV, a/k/a "Allambergen Kuday Bergenov," the defendant, knowingly transmitted in interstate and foreign commerce communications containing threats to injure the person of another, to wit, KUDAYBERGENOV sent threatening messages to a business (the "Victim Business") in which he threatened to kill employees of the Victim Business.

(Title 18, United States Code, Section 875(c).)

COUNT TWO

(Use of False Immigration Identification Documents)

The Grand Jury further charges:

2. On or about at least April 11, 2019, in the Southern District of New York and elsewhere, ALLAMBERGEN KUDAYBERGENOV, a/k/a "Allambergen Kuday Bergenov," the defendant, for the purpose of satisfying a requirement of the employment verification system set forth in subsection 1324a(b) of Title 8 of the United States Code, used false identification documents, to wit, a Permanent Resident Card and a Social Security Card, knowing and having reason to know that the documents were false, to wit, KUDAYBERGENOV, who has never had Permanent Resident status, submitted a Permanent Resident Card with an Alien Registration Number which is not his own, and a Social Security Card with a Social Security Number which is not his own, in support of an application which is a requirement of the employment verification system.

(Title 18, United States Code, Sections 1546(b)(2) and 2.)

COUNT THREE

(Aggravated Identity Theft)


The Grand Jury further charges:

3. On or about at least April 11, 2019, in the Southern District of New York and elsewhere, ALLAMBERGEN KUDAYBERGENOV, a/k/a "Allambergen Kuday Bergenov," the

defendant, knowingly did transfer, possess, and use, without lawful authority, a means of identification of another person during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028(c), to wit, KUDAYBERGENOV possessed, used, and transferred the Alien Registration Number and Social Security Number of another individual for the purpose of satisfying a requirement of the employment verification system set forth in subsection 1324a(b) of Title 8 of the United States Code, in violation of Title 18, United States Code, Section 1546(b)(2), as charged in Count Two of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1), 1028A(b) and 2.)


FOREPERSON


GEOFFREY S. BERMAN
United States Attorney

Form No. USA-33s-274 (Ed. 9-25-58)

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

ALLAMBERGEN KUDAYBERGENOV
a/k/a "Allambergen Kuday Bergenov,"

Defendant.

INDICTMENT

20 Cr.

(18 U.S.C. §§ 875(c), 1028A(a)(1),
1028A(b), 1546(b)(2), and 2.)

GEOFFREY S. BERMAN
United States Attorney


Foreperson

NE
3/24/2020

Indictment Filed
Wheel A - Judge Vyskocil

Sarah L. Cove
US.M.J.